

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In re:

Vijay K. Taneja

Debtor.

Case No. 08-13293-SSM
Chapter 11

DEBTOR'S MOTION FOR APPOINTMENT OF CHAPTER 11 TRUSTEE

COMES NOW, Debtor Vijay K. Taneja, by counsel, and moves pursuant to 11 U.S.C. §1104(a) for appointment of a Chapter 11 Trustee, and states in support thereof the following:

1. This case was commenced by a voluntary Chapter 11 filing on June 9, 2008.

Debtor is presently acting as Debtor-in-Possession.

2. There are four related cases (Elite Entertainment Inc. 08-13286; Financial Mortgage Inc. 08-13287; NRM Investments Inc. 08-13290; and Taneja Center Inc. 08-13292, hereafter referred to as the "Corporate Debtors") which involved corporations the Debtor solely owned and controlled prior to the filing of those Petitions. Those cases were filed the same day as that of the instant Debtor.

3. Prior to the filing of the Petitions herein Debtor caused a third party (Steven Wexler and Marcher Consultants) to be installed as the party managing,

controlling and operating the aforementioned Corporate Debtors, and Mr. Wexler is presently doing so and serving the functions of designated representative for those Corporate Debtors.

4. Based on the facts and circumstances it is likely if not inevitable that one or more creditors on the Office of the United States Trustee will seek appointment of a Trustee in this Debtor's case so as to fulfill independent functions on behalf of the estate. In anticipation of, and in agreement with any such sentiment, Debtor hereby moves for appointment of that Trustee pursuant to 11 U.S.C. §1104(a) and agrees that said appointment is in the best interest of creditors and debtors.

WHEREFORE, Debtor prays for entry of an Order authorizing and directing an appointment of a Chapter 11 Trustee and for such other and further relief as the Court deems appropriate.

Vijay K. Taneja
By Counsel

/s/ Thomas P. Gorman
Thomas P. Gorman, VA Bar #26421
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Debtor's Motion for Appointment of Chapter 11 Trustee was mailed, postage prepaid, and sent via facsimile on the _____ day of June, 2008, to the parties listed below:

Office of the U.S. Trustee
115 South Union Street, Suite 210
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703-557-7279 fax

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/s/ Thomas P. Gorman
Thomas P. Gorman